To: Alison Jones[ajones@clearcreekassociates.com]

From: Rumrill, Nancy

**Sent:** Wed 2/7/2018 5:17:00 PM

Subject: RE: guidelines

Alison, Please consider providing a comment on this so that we can clarify. Thanks, Nancy

United States Environmental Protection Agency

Nancy Rumrill (rumrill.nancy@epa.gov)

Drinking Water Protection Section (WTR-3-2)

US EPA, Region IX

75 Hawthorne St.

San Francisco, CA 94105

Phone (415) 972-3293

From: Alison Jones [mailto:ajones@clearcreekassociates.com]

**Sent:** Wednesday, February 7, 2018 9:11 AM **To:** Rumrill, Nancy < Rumrill.Nancy@epa.gov>

Subject: RE: guidelines

Thank you, Nancy. The guideline says that "the well shall inject for approximately 6 months" before doing this testing. I thought we needed to have the Part 2 MIT completed and approved before we ever inject. I am sorry for the confusion.

Excelsior is definitely planning on doing temp logs within 48 hours of cementing the intermediate casing, as required in the permit. It will tell us where the cemented interval is. But this other logging after 6 months – I am not sure how that fits into the sequence of getting

operational.
Alison
From: Rumrill, Nancy [mailto:Rumrill.Nancy@epa.gov] Sent: Wednesday, February 7, 2018 10:06 AM To: Alison Jones <a jones@clearcreekassociates.com=""> Subject: RE: guidelines</a>
Alison,
Please see the attached guidelines.
Nancy
tinited States Environmental Protection Agency
An anison of produces the execution involves within a substitution of a substitution of a
Nancy Rumrill (rumrill.nancy@epa.gov)
Drinking Water Protection Section (WTR-3-2)
US EPA, Region IX
75 Hawthorne St.
San Francisco, CA 94105
Phone (415) 972-3293

From: Alison Jones [mailto:ajones@clearcreekassociates.com] Sent: Wednesday, February 7, 2018 8:36 AM To: Rumrill, Nancy < Rumrill. Nancy@epa.gov> Subject: guidelines Nancy, In Excelsior's draft UIC permit it refers to "EPA Region 9 Temperature logging guidelines and requirements for evaluation of zonal isolation after injection commences. I am unable to find this document. I did find some Region 5 guidelines, however. Can you provide a link? Thank you. Alison H. Jones, R.G. Senior Hydrogeologist Clear Creek Associates 221 N Court Ave. Tucson, AZ 85701 520.622.3222 office 520.270.2825 cell

